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Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, DC 20554  
202-418-8165

February 21, 2011

Certification of CPNI Filing February 21, 2011

Certification from Callis Communications, Incorporated (Callis), 720 Oak Circle Drive East, Mobile, Alabama 36609, telephone 251-662-8300.

Callis, in accordance with the referenced document as well as DA-06-223 and Title 47 Section 64.2009 does hereby submit the following CPNI Compliance Certificate.

Callis is a VoIP, Paging and Facility Based CLEC provider as well as a long distance reseller. Callis has FCC 214 authorization as well as state authority to operate as a CLEC and long distance reseller in Alabama, Mississippi and Florida.

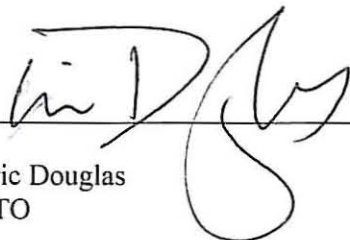
Callis is in compliance with the referenced documents regarding CPNI and will continue to operate in compliance with these rules.

The following information is hereby provided:

- (a) CALLIS has not, nor do we have plans to utilize customer CPNI for any purposes other than in support of the customer's needs and requests in so far as it pertains to the service subscribed to by the customer. Should the situation arise in the future, a procedure is in place to ensure the customer is notified and approves release of appropriate information in advance. Additionally the company CPNI Officer will directly manage and control the use of and CPNI information.

- (b) Personnel who have reason to come into contact with any customer, as well as all supervisory personnel, have been trained not to process, use or release any CPNI without prior approval from the company CPNI Officer. All employees understand that failure to comply will result in disciplinary action in accordance with company policy.
- (c) Procedures are in place to properly maintain CPNI records regarding the use or release of CPNI either within the company or release to a third party. This record includes a description of the campaign, the products and services offered as part of the campaign, the specific CPNI that was used, the date, customer name, contact, and authorization, as well as the approval from the CPNI Officer.
- (d) A supervisory review process is in place to ensure compliance regarding the use of CPNI in any outbound marketing scenarios. Additionally these records will be maintained for a minimum of three years. Advance approval from the CPNI Officer is required before any information is used in any marketing, data collection or other related activity.
- (e) A CPNI Officer has been assigned. For CALLIS, the CPNI Officer is myself, Eric Douglas, CTO. I may be contacted at the above address or at 251-445-6515 or via email at [eric.douglas@mycallis.com](mailto:eric.douglas@mycallis.com).
- (f) It is understood that CALLIS will provide the Commission written notice within five days regarding any opt-out mechanism that may not have worked properly. The details of this notice will comply with Title 47 Section 64.2009(f).

As CTO and CPNI Officer for CALLIS, and as described above, I hereby certify that Callis Communications, Incorporated is in compliance with Title 47, Part 64, Section 64.2009 regarding CPNI rules and regulations.



Eric Douglas  
CTO

February 21, 2011



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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2011

Date filed: *Feb 21, 2011*

Name of company covered by this certification: *Callis Communications, Inc.*

Form 499 Filer ID: *819274*

Name of signatory: *Eric Douglas*

Title of signatory: *CTO*

I, *Eric Douglas*, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. Please see the attachment.

The company *has not* taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company *has not* received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

A handwritten signature in black ink, appearing to read "Eric Douglas", is written over a horizontal line.

**Attachment:** Accompanying Statement explaining CPNI procedures